

Exhibit A

1 BENBROOK LAW GROUP, PC
2 BRADLEY A. BENBROOK (SBN 177786)
3 STEPHEN M. DUVERNAY (SBN 250957)
4 701 University Avenue, Suite 106
5 Sacramento, CA 95825
6 Telephone: (916) 447-4900
7 Facsimile: (916) 447-4904
8 brad@benbrooklawgroup.com
9 steve@benbrooklawgroup.com

10 Attorneys for Plaintiffs

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARCO ANTONIO CARRALERO;
GARRISON HAM; MICHAEL
SCHWARTZ; ORANGE COUNTY
GUN OWNERS PAC; SAN DIEGO
COUNTY GUN OWNERS PAC;
CALIFORNIA GUN RIGHTS
FOUNDATION; and FIREARMS
POLICY COALITION, INC.

Plaintiffs,

v.

ROB BONTA, in his official capacity as
Attorney General of California,

Defendant.

Case No.: 8:23-cv-01798

**DECLARATION OF MARCO
CARRALERO IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

I, Marco Antonio Carralero, declare:

1. I am over 18 years old. I am competent to give this declaration. I have personal knowledge of the matters set forth in this declaration and would be able to testify to them if called as a witness.

2. I am a citizen of the United States, and a resident and citizen of the State of California, currently residing in Orange County, California.

1 3. I am not prohibited under state or federal law from acquiring or possessing
2 firearms or ammunition.

3 4. I have possessed a Georgia Weapons Carry License, issued by the Fulton
4 County Probate Court, since 02/24/2021, and I recently obtained a New Standard
5 California Carry Concealed Weapon (CCW) 2 Year License, issued by the Orange
6 County Sheriff-Coroner Department, for my personal firearm.

7 5. Carrying a personal firearm for self-defense and for defense of my wife is
8 important to me.

9 6. I participated in the Orange County Sheriff's Department Citizen's
10 Academy in 2022 to learn more about local law enforcement in my county. I am a
11 member of the Orange County Gun Owners PAC, the California Gun Rights
12 Foundation, and Firearms Policy Coalition, Inc.

13 7. I completed the application process for a Carry Concealed Weapon (CCW)
14 license from the Orange County Sheriff-Coroner Department, including a course of
15 instruction at an approved training provider deemed acceptable by the Orange County
16 Sheriff's Department CCW Unit on 8/25/23, as required by the State of California to
17 obtain my CCW license.

18 8. I carry, and intend to continue carrying, my personal firearm daily, during
19 all my activities.

20 9. Professionally, I run operations for my family business. Daily
21 responsibilities include managing our company office and warehouse, where we store

1 valuable inventory, equipment, and technology. As a small local business, we cannot
2 afford to hire private security. Since receiving my CCW, I carry my personal firearm
3 for self-defense there every day.

4 10. I either already carry, or plan to carry in the coming weeks, my personal
5 firearm for self-defense to the private businesses I frequent for work including
6 hardware stores, Home Depot, Lowe's, private carriers including UPS and FedEx,
7 and retailers including Target, Walmart, Albertsons-Safeway, Gelson's, CVS, and
8 Ralph's. If SB2's provision about private businesses were to go into effect, I would
9 restrict my carrying practices at private businesses for fear of arrest or prosecution.

10 11. I plan to carry my personal firearm for self-defense to a medical office or
11 other place where medical services are currently provided in the coming weeks and
12 months, both for my own routine medical care and to accompany my wife.

13 12. I would like to carry my personal firearm for self-defense to establishments
14 licensed to serve alcohol for on-site consumption in the coming days, including Oak
15 Ranch Grill, Morena's Mexican Cuisine, and other local eateries I frequent.
16 However, when I filled out my CCW license application, I was informed that even
17 with a license, I could not carry in bars or any location whose primary purpose is to
18 dispense alcoholic beverages for on-site consumption. I am unaware of the legal
19 authority for this restriction, but I comply with it anyway for fear of prosecution. If I
20 were permitted to visit restaurants and bars while carrying my personal firearm, I
21 would not consume alcohol while carrying.

1 13. I plan to carry my personal firearm for self-defense to stadiums near where
2 I live in the next few months, including Championship Soccer Stadium and Angel
3 Stadium of Anaheim. If required by these locations, I would lock my firearm in the
4 provided lockers. But if SB2 goes into effect, I could not even bring my personal
5 firearm into the stadium/arena or its parking lot.

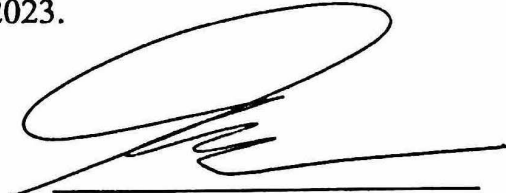
6 14. With my carry permit, I would regularly carry my personal firearm at
7 museums, especially at Bowers Museum in Santa Ana, where I go with my family,
8 and the Surfing Heritage and Culture Center. I also frequent the Dana Point Historical
9 Society where I am a Board Member, and I would carry there in the near future.

10 15. I plan to carry my personal firearm for self-defense to parks near where I
11 live. I frequent the following parks weekly for hiking and walking with family or
12 alone: Crystal Cove State Park, Aliso and Wood Canyons Wilderness Park, Salt Creek
13 Beach Park, San Clemente State Beach, Las Ramblas Trailhead, Ronald W. Caspers
14 Wilderness Park, and Thomas F. Riley Wilderness Park.

15 16. I have every intention and desire to continue to carry for self-defense at the
16 warehouse where I work, at the private businesses I frequent, at bars, restaurants,
17 stadiums, parks, medical offices, and local nature trails. I would continue to carry at
18 these locations in the future, but I will decline to do so because of my credible fear of
19 arrest and prosecution after January 1, 2024, the effective date of SB 2.

20 I declare under penalty of perjury under the laws of the United States of America
21 that the foregoing is true and correct to the best of my knowledge.

1 Executed this 26 day of September, 2023.

2 
3 _____
4 Marco Antonio Carralero